

28 September 1953

**MEMORANDUM FOR:** The Comptroller  
The Director of Security  
The General Counsel  
The Auditor-in-Chief  
The Assistant Director for Personnel  
The Chief of Logistics  
The Chief, General Services

**SUBJECT:** Preparation of Regulatory Issuances

1. The current program to develop a comprehensive set of Agency regulatory publications is clearly slowing down and is becoming bottlenecked in the processes of coordination, editing, and authentication.
2. This does not, in my opinion, indicate either lack of effort, interest or capability on the part of Agency personnel. It is, in part, indicative of the tremendous number of areas where policy determinations have not previously been made and of the extraordinary difficulties in establishing procedures for an Agency which functions on two distinctly different types of funds, functions overtly and covertly, and operates both in the United States and abroad under endless variations of cover and operational circumstances.
3. There is one area, however, in which corrective action can and should be initiated. The simple fact is that the major cause of delay in the development and publication of regulatory material is the poor quality of the material prepared and submitted. This is attributable to:
  - a. Inadequate study of the function or policies under discussion resulting in failure to foresee the practical impact of the material on the Agency components and activities which will be effected thereby. Policies and procedures proposed for adoption are too often incomplete, inadequate, insecure or inapplicable to the full range of Agency activities.
  - b. The organization, presentation, and language used in drafting regulatory material is so inadequate, obscure, and misdirected that major revisions or complete rewritings are necessary before a reasonable degree of intelligibility is achieved.
4. These two failures, rather than policy matters, are probably responsible for ninety percent of the delay in the coordination and publication of regulatory publications.

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5. Fortunately, this is an area in which corrective action can be taken. It requires the training of persons engaged in the actual development and drafting of material in common principles of organization, presentation, and writing which are considered most suitable to the instances of this Agency. Secondly, it requires vigorous supervisory action to ensure that material is thoroughly planned, studied, and organized before it is reduced to writing.

6. To assist you in this effort, I am directing the Regulations Control Staff to prepare or make available written instructional material designed to assist all personnel in the actual preparation and writing of regulatory instances.

7. In addition, the Director of Training has agreed to schedule a training course to teach selected personnel techniques of organization and writing regulatory material with clarity, precision, and readability.

8. In the interim, it is urged that every effort be made to improve the quality of regulatory material being prepared. To the extent that general principles may be of assistance, adherence to the following will eliminate many common faults presently observed:

a. Every instance should be written for maximum impact on and comprehension by the intended reader.

b. Obscure language, vague generalities, lengthy sentences should be avoided.

c. Essential procedures should be presented in chronological order.

d. Flexibility should be ensured by making provision for exceptions to the rule.

e. Authorities and responsibilities should be precisely stated.

f. Your full cooperation is requested.

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L. K. WHITE  
Acting Deputy Director  
(Administration)

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